



Alan C. Lloyd, Ph.D.
Agency Secretary

California Environmental Protection Agency

Air Resources Board • Department of Pesticide Regulation • Department of Toxic Substances Control
Integrated Waste Management Board • Office of Environmental Health Hazard Assessment
State Water Resources Control Board • Regional Water Quality Control Boards



Arnold Schwarzenegger
Governor

Certified Mail: 7003 1680 0000 6174 7510

March 30, 2006

Mr. Jim Widdel, CUPA Contact
Shasta County Environmental Health
1855 Placer Street, Suite 201
Redding, California 96001

Dear Mr. Widdel:

The California Environmental Protection Agency (Cal/EPA) and the Office of Emergency Services conducted a program evaluation of Shasta County Environmental Health Certified Unified Program Agency (CUPA) on October 25, 2005. The evaluation was comprised of an in-office program review. The state evaluators completed a Certified Unified Program Agency Evaluation and a Summary of Findings with your agency's program management staff, which includes identified deficiencies, preliminary corrective actions and timeframes. Two additional evaluation documents are the Program Observations and Recommendations and the Examples of Outstanding Program Implementation.

I have reviewed the enclosed copy of the Summary of Findings and I find that Shasta County Environmental Health programs performance is satisfactory with some improvement needed. Cal/EPA's Unified Program staff will coordinate with your agency to track the correction of any identified deficiencies over the time frame and schedule included in the Summary of Findings.

Thank you for your continued commitment to the protection of public health and the environment. If you have any questions or need further assistance, you may contact Jim Bohon, Manager, Cal/EPA Unified Program at (916) 327-5097 or jbohon@calepa.ca.gov.

Sincerely,

Don Johnson
Assistant Secretary
California Environmental Protection Agency

Enclosures
cc: See next page

Jim Widdel
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cc: Mr. Jim Smith, Environmental Health Manager (Sent Via Email)
Shasta County Environmental Health
1855 Placer Street, Suite 201

Mr. Jack Harrah (Sent Via Email)
Governor's Office of Emergency Services
P.O. Box 419047
Rancho Cordova, California 95741-9047

Mr. Moustafa Abou-Taleb (Sent Via Email)
Governor's Office of Emergency Services
P.O. Box 419047
Rancho Cordova, California 95741-9047



STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY



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CERTIFIED UNIFIED PROGRAM AGENCY EVALUATION
SUMMARY OF FINDINGS

Arnold
Schwarzenegger
Governor

CUPA: Shasta County Environmental Health

Evaluation Date: October 25, 2005

EVALUATION TEAM

Cal/EPA: Tina Gonzales

OES: Jack Harrah

This Summary of Findings includes the deficiencies identified during the evaluation, observations and recommendations for program improvement, and examples of outstanding program implementation activities. The evaluation findings are preliminary and subject to change upon review by state agency and CUPA management. Questions or comments can be directed to Tina Gonzales at (916) 322-2155.

	<u>Deficiency</u>	<u>Preliminary Corrective Action</u>	<u>Timeframe</u>
1	The CUPA has not been meeting the required UST inspections each year. Although the rate has improved this 04/05 with 98% inspection the CUPA explained it still has shortfall in the inspection rates each year. The inspections for 02/03 inspections were 75 %, and the prior years 03/04 are at 89 % inspection rates.	The CUPA is currently looking at this shortfall and working on scheduling and checking on the inspection rates during the year to check for completeness, and at the same time provide training to inspectors to make sure reporting is completed as well. Within the next year to continue rechecking the UST program inspections and reporting to make sure the inspections are thorough and complete and scheduled throughout the year avoiding trying to do all inspections at the end of the year.	1 Year
2	A review of the UST inspection files show the files filed with lack of documentation for correction or re-inspection of the facility with	In the future Document all changes and insert re-inspection notes in the file to	6 months

Certified Unified Program Agency (CUPA)
Evaluation Summary of Findings

	lack of re-inspection documentation. This was explained by the CUPA as a newer inspector not noting the corrections made by the facility, and not knowing or filling out the paperwork intended for that use. The Youngman Trucking UST Active file showed no corrections made to not having a working alarm on the overfill from June 05 inspection Clear Creek Grocery and Locker file showed a broken hose from Vapor Recovery system needed replacement from 2/05 inspection.	show corrections had been made and show re-inspection dates. This will be useful should other if enforcement measures need to be taken. Train new employees in the course of the inspection and re-inspection and perform spot checks to see that files are kept current and up to date.	
3	During the last 3 years of surcharge collection the CUPA has collected 85-90% of the total surcharge needed to be collected. The CUPA states it does have 5-8 facility sites which are hard to collect from and no resources to go after those sites, which are Hazardous Materials Business Plan facilities.	The CUPA will need to look for avenues to go after these sites to collect the required fees through a County Collections Agency or perhaps an ordinance, which had been used in other CUPA's. Develop procedures once an avenue is found to assist the CUPA in the collection of fees from recalcitrant late or non-payers of surcharge fees.	1 year
4	While efforts to regulate agricultural handlers under the business plan program have been initiated, the CUPA has not yet obtained business plans from all farms, and is not conducting business plan inspections of agricultural handlers.	Continue with current plan to regulate farms. Will reassess progress at next CUPA evaluation.	On-going
5	The addition of city, county, and special district sites to the business plan program has substantially increased the number of businesses to be regulated. This has resulted in the CUPA being unable to inspect each business plan facility every three years. Once the farms come into the business plan program, the anticipated additional 40-50 business plan sites will make this situation worse.	Develop a plan to maintain a three year inspection cycle within 1 year. Will reassess at next CUPA evaluation.	1 Year for Plan

Certified Unified Program Agency (CUPA)
Evaluation Summary of Findings

CUPA Representative

(Print Name)

(Signature)

Evaluation Team Leader

(Print Name)

(Signature)

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Evaluation Summary of Findings

PROGRAM OBSERVATIONS AND RECOMMENDATIONS

1. **Observation:** In the review of the CUPA's web site information on Unified Program Surcharge, it was noted that fees were not posted for the program, as these fees change yearly. It would be useful to the viewers of the web site to actually have the fees posted to better serve the business needs of the community and public information on the actual fee structure.

Recommendation: A good suggestion would be to have the CUPA place the current fee schedule on the web site, just as they do the other fee information, and update this as needed when changes occur. The fee schedule actually has not changed for a few years now, so stating the changes occur yearly is erroneous.

2. **Observation:** A review of the CUPA training showed certificates being kept in each individuals file. It would be a good idea to have training documented on a data base that could be pulled up and printed out which would help show other training received that may not necessarily give out certificates or other documentation as proof of training.

Recommendation: Develop a simple data base or use an existing data base to capture this information. Use the employee name, the title(s) of courses taken, and the hours of each class. Keep in mind too that when attending conferences, there may be several classes taken each day, and to also list these classes individually to better show what classes were actually attended.

3. **Observation:** Appendix 4 of the area plan has some obsolete information. The OES Haz Mat Unit general number is now (916) 845-8711. OES mailing address is 3650 Schriever Ave, Mather CA 95655.

Recommendation: OES recommends this appendix be corrected as soon as possible.

Certified Unified Program Agency (CUPA)
Evaluation Summary of Findings

EXAMPLES OF OUTSTANDING PROGRAM IMPLEMENTATION

1. The CUPA's format for the 2004/2005 self audit works well for readability purposes and finding information useful in the review of the year's activities. Information on all the programs was provided with figures provided when needed, and includes recommendations on correcting the deficiencies noted in the report.
2. The CUPA has provided the use of Underground Storage Tank forms and Hazardous Waste forms for Generator and Treatment on their Web Site for easy access to businesses and others seeking that information.
3. The CUPA has a strong Community Education Section responsible for providing information and community education through several community events throughout the year, and classroom presentations. Recycling information is also provided as part of the Community Education, which is a good public relations tool in public service.
4. The CUPA inspectors spend time in the field during inspections assisting clients with forms and educating businesses; thereby its compliancy effectiveness of their permitting, inspection, and compliance assistance rate of is very good, reducing the need for further enforcement measures.
5. The CUPA works closely with the local circuit prosecutor's office on enforcement issues and has initiated two formal enforcement actions in the last year-one case pending. The CUPA is maintaining a good working relationship with the prosecutor's office.
6. The CUPA coordinates and assists other State and City Agencies with release and complaint investigations and follow-up actions, thus building an effective, efficient office serving the needs of local business plus protecting human health and the environment.
7. The CUPA is improving their inspection and enforcement procedures and are bringing business into compliance, activities are implemented in a more consolidated and consistent manner.
8. The CUPA uses Access Data Management to issue consolidated bills to regulated businesses once per year. The system is also tracking accounts receivable and personnel hours.
9. The CUPA inspectors are trained to inspect all programs applicable to businesses they inspect by increasing their presence at the site inspected and creating a single point of contact.
10. The Senior Environmental Health Specialist attends the Northern CA CUPA Forum meetings and is the alternative Forum member for Northern Regional CUPA Forum Board.
11. The CUPA has made an excellent start on the CalARP Program. The stationary sources have been identified, where applicable, preliminary risk determination has been begun, and RMPs have been requested from stationary sources as appropriate. In a number of cases, RMPs have been revised after the CUPA found deficiencies. CUPA personnel are actively participating in hazard reviews and

Certified Unified Program Agency (CUPA)
Evaluation Summary of Findings

process hazard analyses. Inspections have begun, and the CUPA plans to inspect one stationary source per month until all have been inspected.

- 12.** Inventories were up-to-date and emergency response plans and training programs were current in all business plan files reviewed. Information to be kept confidential is kept in one section, and tabbed for easy removal during a public information request.



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